

February 19, 2016

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Re: **EB Docket 06-36**

Southern California Edison Company (d/b/a Edison Carrier Solutions) CPNI Certification for 2016 covering the prior calendar year 2015


I, Paul Grigaux, am a Vice President of Southern California Edison Company ("SCE") and Managing Officer of its Edison Carrier Solutions business, a provider of U.S. telecommunications services.

Pursuant to Section 64.2009(e) of the rules of the Federal Communications Commission ("FCC"), 47 C.F.R. §64.2009(e), I hereby certify that I have supervisory responsibility for compliance with the FCC's customer proprietary network information ("CPNI") rules, 47 C.F.R. §§64.2001-2009, and Section 222 of the Communications Act of 1934, as amended (the "Act"), 47 U.S.C. §222, and that, for the period January 1, 2015 to December 31, 2015, SCE was in compliance with those rules.

As indicated in the accompanying statement, SCE has established operating procedures that are adequate to ensure that the company is in compliance with the intent of the FCC's CPNI rules and Section 222 of the Act.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the FCC) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.



Paul Grigaux
Vice President, Transmissions, Substations & Operations,
Southern California Edison and Managing Officer of its
Edison Carrier Solutions business

Southern California Edison (d/b/a Edison Carrier Solutions) Statement Explaining Compliance with CPNI Rules

SCE's Telecommunications Business

SCE, through its commercial telecommunications business, Edison Carrier Solutions, predominantly provides point to point telecommunication transport services to other telecommunications carriers. We also provide point to point telecommunication transport to a limited number of large business enterprises pursuant to contract. SCE does not, and never has, sold dial-tone services (i.e. telephone local exchange service and/or telephone toll service) to any end users, wholesale, retail, or residential consumers, or anyone. SCE's telecommunications business consists of passive conduits providing network capacity exclusively to other telecommunications carriers or large business enterprises.

SCE Does Not Possess any CPNI

SCE possesses only two pieces of information about its telecommunications customers: (i) the locations (start and end-points) of their connections to SCE's system, and (ii) the maximum available capacity of any leased dark fiber or transport service.

Although SCE's telecommunications customers may route retail telephone calls through SCE's system, SCE cannot and does not receive any data about such calls. SCE does not know the identity of any callers, telephone numbers, length of calls, or any other information about the data routed through its system. Put simply, SCE does not possess any customer proprietary network information that compliance with 47 U.S.C. § 64.2009(e) is designed to protect.

SCE's Procedures for Safeguarding the Customer Information It Does Possess

SCE signs mutual non-disclosure agreements (NDAs) as a mandatory part of its contract with each carrier and enterprise customer. Those NDAs prohibit SCE from disclosing any of the little information it has about a customer to any party other than the customer itself. SCE does not use information about its telecommunications customers to market any other SCE product or service to those customers or any other customer.

If SCE in the future provides dial-tone services to customers and uses or has access to any CPNI, it will establish a supervisory review process to ensure compliance with the FCC's end user CPNI rules, including monitoring company practices, and requiring that SCE obtain customer approval of use or disclosure of CPNI before such information is used in any marketing efforts.